

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**GORSKI & KNOWLTON PC**

Carol L. Knowlton (NJ Bar No. 017501981)  
311 Whitehorse Avenue, Suite A  
Hamilton, New Jersey 08610

*Counsel for Creditor George J. Gerro*

In Re:

BLOCKFI INC., *et al.*<sup>1</sup>

Debtors.

Case No.: 22-19361 (MBK)  
(Jointly Administered)

Chapter 11

Hearing Date: July 20, 2023

Judge: The Honorable Michael B. Kaplan

**NOTICE OF CROSS-MOTION OF GEORGE J. GERRO FOR AN ORDER  
TEMPORARILY ALLOWING CLAIM NO. 12386  
PURSUANT TO F.R.B.P. RULE 3018(a)  
FOR THE SOLE PURPOSE OF VOTING ON A CHAPTER 11 PLAN**

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**PLEASE TAKE NOTICE** that George J. Gerro (“Gerro”) shall cross-move for an order temporarily allowing Claim Number 12386, pursuant to Federal Rules of Bankruptcy Procedure rule 3018(a) for the sole purpose of voting on a Chapter 11 Plan, on July 20, 2023 at 11:30 a.m. (ET), or as soon thereafter as counsel may be heard, before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge, Courtroom #8, of the United States Bankruptcy Court for the District of New Jersey (the “Bankruptcy Court”), 402 East State Street, Trenton, New Jersey 08608.

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<sup>1</sup> The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC. (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors’ service address is 100 Horizon Center Blvd., 1st and 2nd Floors, Hamilton, NJ 08691.

**PLEASE TAKE FURTHER NOTICE** that Gerro shall rely upon the concurrently filed *Response of George J. Gerro to Debtors' Fourth Omnibus Objection to Certain Claim*, Gerro's Proofs of Claim, No. 12386, the attached Certification of George J. Gerro, Memorandum of Law, (collectively, "Motion Package").

**PLEASE TAKE FURTHER NOTICE** that any opposition to the Cross-Motion must be served not later than four (4) days before the hearing date. Written objections to the Cross-Motion shall be filed with the Clerk of the United States Bankruptcy Court, for the District of New Jersey, Clarkson S. Fisher Courthouse, 402 E. State Street, Trenton, New Jersey 08608. A copy thereof must be electronically served upon George J. Gerro, 530 S. Glenoaks Blvd., Suite 200, Burbank, California 91502, telephone: (818) 840-0000, email: [George@GerroLaw.com](mailto:George@GerroLaw.com)

**PLEASE TAKE FURTHER NOTICE** that in the absence of any objections, the relief requested hereunder may be granted without further notice.

**PLEASE TAKE FURTHER NOTICE** that, oral argument is requested, unless the Court directs that no oral argument would be necessary.

Dated: July 13, 2023

/s/ Carol L. Knowlton

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*Attorneys for Creditor and Party in Interest  
George J. Gerro*